

EXHIBIT

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February 12, 2013

John H. Bredell, Esq.
119 North Huron Street
Ypsilanti, MI 48197

Re: Nationwide v Keene
O/File: 839576

Dear Mr. Bredell:

We reviewed the documents that you produced the evening before and during the hearing on Nationwide's motion to compel. Although you advised the Court that *all* of the documents were now produced, a review of the documents shows that this is not the case.

The following documents have still *not* been produced and there is no affirmative statement indicating that they do not exist:

17(e) Please provide all monthly statements or other such documents, from 1998 through 2010, for all financial accounts (savings accounts, investment accounts, checking accounts, money market accounts, 401(k) accounts, IRAs, stocks, investment accounts, etc.), including, but not limited to the following accounts:

a. Fidelity Account ending #6204

The documents you produced are missing every other page.

e. Accounts with DCFU Financial (as identified on US-1040)

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You advise that these have been requested and that they will be produced. They have not been produced.

g. Chase account ending #6764 (previously received 2005 through 2010)

You attach a letter from the bank stating “[w]e are unable to send you your statements from 1998 to 2005. Statement copies can only be ordered for up to seven years from the current date of request.” However, the bank goes on to state that “[y]ou can visit a Chase branch to inquire if they will be able to provide you the copies of the statements that you need”

There is no information provided regarding obtaining these documents from your Chase branch bank.

17(f) Please provide copies of all debt documents (personal loans, land contracts, promissory notes, mortgages, bank loans, business loans, credit cards, credit accounts, lines of credit, etc.), from 1998 through 2010 including, but not limited to the following accounts:

- a. National City Home equity line of credit account ending #7813:
 - i. All statements except for statement ending March 10, 2010

You advise that these have been requested and that they will be produced. They have not been produced.

- b. Washington Mutual Account ending #1514:
 - i. Statements for all months except for October 17, 2006

You claim this account was transferred to Chase and then attach a transaction history from 1/1/08 to 12/9/13. There is no indication whether or not Washington Mutual has or has not retained records prior to 1/1/08 or if a request for these records was even made to Washington Mutual.

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c. Chase MasterCard account ending #0389:

i. All statements from 1998 to statement ending November 10, 2008

You attach a letter from the bank stating “[w]e are unable to send you your statements from 1998 to 2005. Statement copies can only be ordered for up to seven years from the current date of request.” However, the bank goes on to state that “[y]ou can visit a Chase branch to inquire if they will be able to provide you the copies of the statements that you need”

There is no information provided regarding obtaining these documents from your Chase branch bank.

Further, although you claim to attach statements from 12/11/06 to 12/10/08, these were not attached.

d. Chase credit card account ending #1499:

i. Statements ending May 15, 2006 through August 15, 2006

You attach a letter from the bank stating “[w]e are unable to send you your statements from 1998 to 2005. Statement copies can only be ordered for up to seven years from the current date of request.” However, the bank goes on to state that “[y]ou can visit a Chase branch to inquire if they will be able to provide you the copies of the statements that you need”

There is no information provided regarding obtaining these documents from your Chase branch bank.

ii. Statements ending December 15, 2006 through November 11, 2008

In your response you indicate that you have attached all statements for 12/16/06 to 12/16/10. However, statements are still missing for the periods ending on 12/15/06, 5/15/07, 6/15/07, 7/15/07, and 10/15/07 to 3/15/08.

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- e. Costco Card account ending #1002:
 - i. All statements from 1998 to 2008

Your response is to see the attached statements. However, the attachment is missing statements for 10/07, 12/07, 1/08, 4/08, and 6/08.

- f. National City Card account ending #9960:

You advise that these have been requested and that they will be produced. These documents have not been produced.

- g. Citi Card account ending #7421:

You advise that these have been requested and that they will be produced. These documents have not been produced.

- h. Citi Drivers Edge Card account ending #4617:

You claim to attach statements for 1/1998 to 12/21/10. However, you only attach statements for 3/24/98 to 4/23/01. You have not produced the requested statements.

Very truly yours,
HARVEY KRUSE, P. C.

Michael F. Schmidt

MFS:KAK

cc: Jeffrey A. Danzig, Esq.
Albert L. Holtz, Esq.